

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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In re	:	In Chapter 13
	:	
VENESSA EDWARDS	:	
	:	
	:	Bankruptcy No. 14-18792 (AMC)
	:	
Debtor.	:	Hearing Date: 1/23/18 at 10:00am
	:	
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**CITY OF PHILADELPHIA’S LIMITED OBJECTION TO MOTION TO MODIFY
PLAN AFTER CONFIRMATION**

AND NOW, comes the City of Philadelphia (“the City”), a secured and priority creditor in the above-captioned case, by and through its counsel, Pamela Elchert Thurmond, Deputy City Solicitor, pursuant to Local Bankruptcy Rule of Civil Procedure of 9014-3, to respond to the Motion to Modify Plan After Confirmation (“the Motion”) filed by the Debtor.

The City of Philadelphia files this limited objection to the Debtor’s Motion to modify her plan as a modified plan was not filed with the motion and the City desires the ability to review the modified plan before an order approving it is entered. Without seeing the proposed modified plan, the City cannot confirm its interests are being properly provided for in the modified plan.

WHEREFORE, the City respectfully requests that this Court DENY the Debtor’s Motion to Modify Plan after Confirmation.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: January 2, 2018

By: /s/ Pamela Elchert Thurmond
PAMELA ELCHERT THURMOND
Deputy City Solicitor

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